COMPLIANCE MONITORING & INDICATOR 13: **BRICKS & MORTAR**

Jeff Studer, Interim Director, ESS-Flagstaff
and
William McQueary, ESS Transition Specialist

Arizona Department of Education
Exceptional Student Services

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Eight Components

1. Measurable Postsecondary Goals
2. Updated Annually
3. Based on Age Appropriate Transition Assessment
4. Transition Services = Coordinated Set of Activities
5. Transition Services = Courses of Study
6. Annual Goals
7. Student Invitation
8. Agency Participation

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Session Outcomes

o A quick review of secondary transition requirements and compliance monitoring standards.

o A better understanding of different ways to plan and document compliance:
   - **Compliance**
   - **Unacceptable or "Out"**
   - **Best Practice**

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Compliance in Transition Planning and Documentation

o **Compliance:** Planning and documentation is individualized and addresses transition-related FAPE, and can be considered compliant under the language of IDEA '04 and OSEP's Indicator 13 guidance. *Reference the ADE/ESS Monitoring Manual, September 2009 Special Education Monitoring Alert, and NSTTAC Checklist for additional information.

o **Unacceptable or "Out":** Planning and documentation does not meet Indicator responsibilities and will result in an "Out" call during monitoring. It is likely that FAPE is not being provided and the PEA is vulnerable to complaints and due process issues.

o **Best Practice:** Planning and documentation reflects effective transition practices, is individualized and addresses transition-related FAPE, meets the "stranger test," and assists PEAs in avoiding confusion, disagreement, or more significant issues. This level of documentation usually requires increased effort.

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What is Indicator 13?

Indicator 13 = transition services for students:

Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority. (20 U.S.C.1416(a)(3)(B))

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Monitoring Guide Steps: Transition

<u>III.A.6:</u> For students 16 years of age or older, documentation of required secondary transition components.
(Pages 166-172)

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Ind. 13 Component #1: Measurable Postsecondary Goals

III.A.6: Documentation of measurable postsecondary goals (MPG) that were updated annually in the areas of education, training, and employment, and, when appropriate, independent living skills.
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Measurable Postsecondary Goals (MPGs)

Compliance: MPGs
- are in all required areas,
- reflect student strengths, preferences & interests,
- *imply* completion post-graduation, and
- are measurable.

Unacceptable or "Out":
- No MPGs present or all required areas not addressed, not based on strengths, interests & preferences.

Best Practice: MPGs
- are in all required areas,
- reflect student strengths, preferences, & interests,
- *clearly* state completion will occur post-graduation and
- are measurable postsecondary outcomes.

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Measurable Postsecondary Goals (MPGs)

Compliance: Required MPG areas are:

1. Training/Education
2. Employment
3. Independent Living Skills (where appropriate)

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Measurable Postsecondary Goals (MPGs)

Example #1:

Compliance:
Jeff will be a motorcycle mechanic.
Unacceptable or "Out":
Jeff likes motorcycles.
Best Practice:
After graduation, Jeff will work as a motorcycle mechanic for Harley-Davidson.

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Measurable Postsecondary Goals (MPGs)

Best Practice: Criteria for an effective MPG:

- Clearly written to occur *after* exiting secondary education. For example: "After graduation.."
- Are measurable outcomes and
- completion could occur many years into the future, not just one year out.

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Measurable Postsecondary Goals (MPGs)

Example #2:

Compliance:
Linda will enroll at ASU.
Unacceptable or "Out":
Linda will research going to college.

Best Practice:
Upon completion of school, Linda will enroll in the mechanical engineering program at ASU.

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Ind. 13 Component #2: Updated Annually

III.A.6: Documentation of measurable postsecondary goals (MPGs) that were updated annually.
(Page 166)

III.A.2: An IEP review was conducted within the last 365 days from the previous IEP date.
(Page 153)

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Ind. 13 Component #3: Age Appropriate Transition Assessment

III.A.6: Documentation that the measurable postsecondary goals were based upon age-appropriate transition assessment(s).
(Page 171)

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Updated Annually

Compliance:
- Date of current IEP is within 365 days of the previous IEP date.

Unacceptable or "Out":
- Expired IEP.

Best Practice:
- MPGs change each year as a result of information from formal/informal assessment.
- MPGs change as a result of activities completed the year before.
- MPGs increase in specificity.

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Age Appropriate Transition Assessment

Compliance:

- IEP has information that correlates to results from the age-appropriate assessment(s), and the strengths, preferences and interests of the student for each of the MPGs.
- Classroom/job performance information in the IEP correlates to the stated MPGs.

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Updated Annually

Example #1:

Compliance:
- Date on a current IEP is within 365 days of the previous IEP date.

Unacceptable or "Out":
- Expired IEP.

Best Practice:
- *Freshman Goal:* After graduation, Ann will work with children.
- *Sophomore Goal:* After graduation, Ann will work as a Teacher in Early Childhood Education.
- *Junior Goal:* After graduation, Ann will work as a Preschool Teacher in a local PEA.
- *Senior Goal:* After graduation, Ann will work as a Preschool Teacher in Phoenix Elementary School District.

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Age Appropriate Transition Assessment

Compliance:

Example:

MPG = After graduation, Larry will work in law enforcement.
- The assessment section of the IEP documentation states: "Student Interview" and "Report from the ROTC Teacher."
- The PLAAFP documentation states: "Larry's interest and preference is to be a policeman. This summer he attended the police sponsored summer camp. His ROTC teacher indicates he is a good student."

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Age Appropriate Transition Assessment

Unacceptable or "Out":

o No documentation of any age-appropriate transition assessment(s).

o Boilerplate statements.

o No evidence of transition assessment(s) information even though measurable postsecondary goals are present.

o The Transition Planning Interview identifies preferences and interests only; not the student's strengths.

o Assessment(s) in the IEP and/or information from assessment(s) do not support the MPGs as a strength, preference, or interest.

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Age Appropriate Transition Assessment

Best Practice:

Example:

MPG = After graduation, Larry will work as a policeman for the Chinle Police Department.

o Assessment section of the IEP lists: ASVAB, Report from teacher in ROTC, and student interview of a current police officer.

o The strengths, needs and preferences IEP section summarizes the results of the assessments: "The ASVAB score indicates a strength area as being in the Military Police," and "His ROTC teacher indicates he is a great candidate for the military."

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Age Appropriate Transition Assessment

Unacceptable or "Out":

Example:

MPG = After graduation, Larry will work in Law Enforcement.

o The assessment section of the IEP documentation states: "student interview."

o The PLAAFP documentation states: "Larry has had 23 discipline referrals for fighting this past year. Larry has significant problems following instruction. His ROTC teacher indicates he is failing ROTC."

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Ind. 13 Component #4: Coordinated Set of Activities

o III.A.6: Documentation of at least one transition service/activity that focuses upon improving the academic and functional achievement of the student to facilitate movement from school to post-school as identified in the measurable postsecondary goals.
(Pages 168-169)

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Age Appropriate Transition Assessment

Best Practice:

o Assessment(s) are clearly listed.

o IEP has a summary statement of the results of the specific formal/informal age-appropriate assessment(s) that support, as written, each MPG (i.e., information identifies strengths, preferences, and interests that support why the MPGs were selected). The summary statement clearly identifies which assessment provided the information used to write each MPG.

o Actual classroom/job performance demonstrating required job skills for the MPG are summarized and used as informal assessment to support the MPGs.

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Coordinated Set of Activities

Transition services include the areas of:

1. Instruction
2. Community Experiences
3. Related Services
4. Employment
5. Adult Living
6. Functional Vocational Evaluation
7. Daily Living Skills (if appropriate)

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Coordinated Set of Activities

Compliance:

- Services/activities are only needed in areas that will reasonably enable the student to meet the measurable postsecondary goals.
- A specific service/activity that correlates in assisting with reasonably enabling a student to achieve their MPGs.
- A single service/activity that supports one or all MPGs.

Unacceptable or "Out":

- Services/activities are not correlated to the MPGs.
- Services/activities are not individualized (boilerplate).
- Generic services/activities.

Best Practice:

- IEP has information that addresses all areas and clearly identifies specific services/activities that the student will complete to reasonably enable them to achieve each MPG.
- Multiple activities.

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Coordinated Set of Activities

Best Practice

Example:

MPG: After completion of school, Ray will enroll in the UTI-Diesel Mechanic certification program.

Instruction
Receive instruction to apply to UTI and research scholarship opportunities.

Community Experiences:
Utilize *Community Information and Referral* to identify 3 strategies to establish transportation to UTI-Phoenix.

Employment
Participate in a job shadow in a diesel mechanic facility.
Obtain part-time or summer employment at NAPA Auto Parts store.

Adult Living
At the beginning of senior year, Ray will visit UTI- Phoenix.

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Coordinated Set of Activities

Compliance

Example:

MPG: After completion of school, Ray will enroll in a diesel mechanic certification program.

Instruction
Receive instruction to apply to a training program and research scholarship opportunities.

Adult Living
At the beginning of senior year, Ray will visit a diesel mechanic certification program.

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Ind. 13 Component #5: Courses of Study

III.A.6: Transition services include courses of study that focus on improving the academic and functional achievement of the student to facilitate the movement from school to post-school.

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Coordinated Set of Activities

Unacceptable or "Out"

Example:

MPG: After completion of school, Ray will enroll in a diesel mechanic certification program.

Instruction
Required courses for graduation.
Field trips; volunteer; visit the mall.
Employment
Will look for work.
Adult Living:
Will get a drivers license.

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Courses of Study

Compliance:

- Course titles correlate to the MPGs.
- At least one course within the courses of study that correlates to an MPG.
- Courses of study that reflect current year of planning only.

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Courses of Study

Unacceptable or "Out":
- Course titles are contra-indicative of reasonably enabling a student to achieve the MPGs (i.e., student's MPG is to become an accountant and student is only taking remedial math courses in a self contained setting).
- No connection between courses listed and MPG and/or there is not a clarification statement that aligns the course to the goal.
- No courses listed.
- Course of study not individualized (i.e., course of study is the same as that of a general education student).

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Courses of Study

Compliance

Example 2:

MPG: Pat will work as a welder after graduation.
- Courses of study contain:
  - "Freshman Careers" class.
  - "Business Math" class.

Freshman	Sophomore	Junior	Senior
Freshman Careers	Biology	Business Math	Algebra 2
English 1-2	English 3-4	English 4-5	Senior English 5-6
Choir 1-2	Choir 3-4	Introduction to Art	Weight Training

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Courses of Study

Best Practice:
- Course titles directly connect to the MPGs…or
- there is connectivity between the courses and their relation to the MPGs (clarification statement for a course title that does not clearly align to the MPG in the IEP).
- Courses of study supports each MPG.
- Courses of study that reflect a multi-year plan.

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Courses of Study

Unacceptable or "Out"

Example:

MPG: Pat will work as a welder after graduation.
- Example 1:
  - Courses of study does not contain a listing of courses.
- Example 2:
  - Courses of study includes "Sewing 1-2 and no other relevant coursework."
- Example 3:
  - Courses of study includes "Electives" and no other relevant coursework.

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Courses of Study

Compliance

Example 1:

MPG: Pat will work as a welder after graduation.
- Courses of study contain:
  - "Metals Class" for the current Junior year.

Junior Year
Metals Class
Algebra
English 4-5

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Courses of Study

Best Practice

Example 1:

MPG: Pat will work as a welder after graduation at Max's Welding Services.
- Courses of study contain:
  - "Welding for Industry" class.
  - Each year (Freshman – Senior years).

Freshman	Sophomore	Junior	Senior
Welding for Industry 1-2	Welding for Industry 3-4	Welding for Industry 5-6	Welding for Industry 7-8
English 1-2	English 3-4	English 5-6	English 7-8
Intro to Computers	Business Math	Weight Training	Adv. Weight Training

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Courses of Study

Best Practice

Example 2:

MPG: Pat will work as a welder after graduation at Max's Welding Services.

- o Connection to MPG is documented in the IEP:
  - ❑ "Freshman Math," where Pat will completed measurement unit related to welding.
  - ❑ "Sophomore English," where Pat will complete composition of business memos.

Sophomore	Junior
Sophomore Math	Algebra 1
English 3-4	English 5-6
Intro to Computers	Advanced Computers

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Ind. 13 Component #6: Annual Goals

<u>III.A.6</u>: Documentation of annual IEP goals that will reasonably enable the student to meet the postsecondary goals.

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Annual Goals (Aligned to the MPGs)

Compliance:

Annual goals appear to support the reasonable attainment of MPGs (i.e., increasing reading comprehension supports being a newscaster or editor).

Unacceptable or "Out":

No annual goals in the IEP.

Best Practice:

The annual goal specifically references a MPG (i.e., "…to enable the student to become…a welder.")

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Annual Goals (Aligned to the MPGs)

Compliance

Examples:

<u>**Education/Training Goals**</u>

MPG: Upon completion of school, John will complete on-the-job training for telemarketing.

Annual Goal: Using grade-level social studies textbook and current reading assignment, John will orally read 100 wpm with no more than an average 3 errors over 4 trials as measured by classroom-based assessments. He currently reads 75 wpm with an average 5 errors over 4 trials.

MPG: Upon graduation from high school, Rolanda will participate in an in-home or center-based program designed to provide vocational training with hand-over-hand assistance.

Annual Goal: Rolanda will increase her tolerance of hand-over-hand assistance. (Note: this annual goal is not measurable but supports MPG.)

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Annual Goals (Aligned to the MPGs)

Unacceptable or "Out"

Example:

<u>Education/Training Goals</u>

MPG: Upon completion of school, John will complete on-the-job training for telemarketing.

Annual Goal: John will investigate careers of interest. (Note: this is the only annual goal listed in the IEP).

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Annual Goals (Aligned to the MPGs)

Best Practice

Examples:

<u>**Education/Training Goals**</u>

MPG: Upon completion of school, John will complete on-the-job training for a telemarketing job.

Annual Goal: Using grade-level social studies textbook and current reading assignment, John will orally read 100 wpm with no more than an average 3 errors over 4 trials to prepare *to be a telemarketer* as measured by classroom-based assessments. He currently reads 75 wpm with an average 5 errors over 4 trials.

MPG: Upon graduation from high school, Rolanda will participate in an in-home or center-based program designed to provide vocational training with hand-over-hand assistance.

Annual Goal: Rolanda will increase her tolerance of hand-over-hand assistance from the Therapy Practitioner from 30 minutes to 45 minutes during 3 out of 5 sessions per week to participate in the completion of a chore at home.

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Ind. 13 Component #7:
Student Invitation

III.A.6: Documentation that the student who is at least 16 years of age was invited to the IEP meeting when postsecondary transition services were being discussed.
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Ind. 13 Component #8:
Outside Agency Participation

III.A.6: Evidence that a representative of another agency that is likely to provide and/or pay for transition services has been invited to the meeting *after consent* from the parent or student who *has reached the age of majority.*
(Page 170)

Student Invitation

Compliance:
o Student's name is on the IEP section (if he/she attended); or

o Clear documentation that the student was invited to participate in the IEP if they chose not to attend.

Unacceptable or "Out":
o No documentation that the student was invited and/or their name is not included on the participation portion of the IEP.

Outside Agency Participation
(with PRIOR consent)

Compliance:
Any combination of documents separate from the IEP that documents the consent date
and…
The agency name appears on the IEP and/or other invitation notification with a date on it, which taken together,
Document that consent was given prior to the date of invitation of the agency.

Student Invitation

Best Practice:
o Document used, or a separate invitation form, specifically invites and records whether the student will/will not attend the IEP because transition services will be discussed (with a date on it); or

o Clear documentation that the student's input was represented at the IEP because they chose to be absent.

Outside Agency Participation
(with PRIOR consent)

Unacceptable or "Out"

No documentation that the consent was obtained prior to an invitation
or
No documentation of an invitation made to the outside agency after consent was obtained.

Note: Checkboxes for consent and/or invitation are not acceptable.

Outside Agency Participation (with PRIOR consent)

Best Practice:

PEA creates a separate form that documents the date the consent to invite an outside agency was received. The form shows a separate date the outside agency invitation was sent and that date is clearly after consent was provided.

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Transfer of Student Rights at the Age of Majority

Compliance/Best Practice:
The date documented in the IEP is not less than one year prior to the date the student turns the age of majority.

Unacceptable or "Out":
If the student is turning 17 in the *current IEP year* and there is no evidence that the student and parent have been informed that rights transfer.

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Monitoring Guide Steps: Transition

III.A.7: Additional Postsecondary Transition Components.
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Summary of Performance

<u>III.A.7:</u> There is documentation of a summary of academic achievement and functional performance including recommendations to assist an exiting student in meeting her/his postsecondary goals.
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Transfer of Student Rights at the Age of Majority

<u>III.A.7:</u> By age 17, the student's IEP must contain a statement that the student has been informed of his or her rights that will transfer to the student at age 18.
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Summary of Performance

Compliance/Best Practice:
There is documentation that includes three components:
- Summary of academic achievement.
- Summary of functional performance.
- Recommendations on how to assist the student in meeting their MPGs (i.e., modifications, accommodations and *assistive technology*).

Unacceptable or "Out":
- The PEA has documentation of summaries of academic achievement and functional performance but not all three components are included

  or
- There are no summaries of performance.

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Resources

- Arizona's Monitoring System Manual:
  http://www.ade.state.az.us/ess/programsupport/Monitoring/2009-2010MonitoringManual.pdf
- ADE/ESS Secondary Transition:
  http://www.ade.state.az.us/ess/SpecialProjects/transition
- Division on Career Development and Transition:
  http://www.dcdt.org
- NSTTAC: http://www.nsttac.org/
- NPSO: http://www.psocenter.org
- Mountain Plains Regional Resource Center:
  http://www.rrfcnetwork.org/mprrc
- Transition Coalition:
  http://www.transitioncoalition.org/cgiwrap/tcacs/new/index.php

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Contact Us

Each PEA is assigned a Program Specialist for compliance technical support and guidance

Transition and Program Specialists can be reached at the main ADE number for each regional office:
- Phoenix: 602-542-4013
- Flagstaff: 928-679-8100
- Tucson: 520-628-6330

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